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**From:** Charmley, William [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FB1828FB00AF42FFB68B9E0A71626D95-CHARMLEY, WILLIAM]  
**Sent:** 9/18/2013 9:03:10 PM  
**To:** Grundler, Christopher [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d3be58c2cc8545d88cf74f3896d4460f-Grundler, Christopher]  
**Subject:** Fw: Slide deck  
**Attachments:** LD 2017+ GHG RTC NADA HD Excerpt.pdf

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**From:** Charmley, William  
**Sent:** Wednesday, September 18, 2013 1:02:40 PM  
**To:** dgreenhaus@nada.org; Koblenz, Andy  
**Subject:** RE: Slide deck

Dear Doug and Andy –

Thanks for providing an advanced copy of the slides for our meeting this afternoon with ATD. We will have printouts in Ann Arbor for the EPA participants, and we have sent a copy to our colleagues at NHTSA. My understanding is that Mr. Jim Tamm and one of his staff will participate in the meeting.

The purpose of our meeting today is to begin a dialog with ATD regarding the development of a next phase of standards for medium and heavy-duty vehicles to reduce GHG emissions and fuel consumption. As part of that effort, we want to hear what are the big picture initial concerns from your members.

As such, we will truly listen and ask questions.

After looking through the slides, I don't want to get into a technical argument this afternoon with the representatives from the dealerships today, but I also don't want NADA/ATD to believe that EPA agrees with all of the points articulated in the slides you have provided.

I am specifically referring to slides 5-9.

I am attaching the sections of the 2017-2025 Light-duty GHG rulemaking Response to Comments document. It was in that context that NADA provided EPA with a new study regarding previous HD standards, and therefore that is where we responded to the comments.

We do not agree with the conclusions of that previous study, at least the details within the study. We obviously do agree that HD vehicle costs have gone up significantly in the past decade, and we agree that the EPA 2004 and 2007-2010 NOx and PM standards attributed to those increases in cost. But we do not agree that those standards are the sole reason for the increase in costs.

In addition, we do not agree that the EPA standards are the sole reason for the large swings in HD vehicle sales in the last ten years. It is simply wrong to imply that during the largest recession in U.S. history in the past 20+ years had nothing to do with the changes in HD vehicle sales, and also that the 2001 recession had no impact on HD truck sales.

I am not trying to be argumentative; I just want to make sure there are no misunderstandings regarding EPA's perspective on several of these topics.

I don't think this changes at all our interest in hearing about the concerns of the HD dealerships, and what they see as the actual impacts of the increase in the cost of HD vehicles over the past decade, which EPA's regulations contributed to, and what we can do in the context of the future HD phase 2 rule development to address those concerns.

Thanks  
Bill

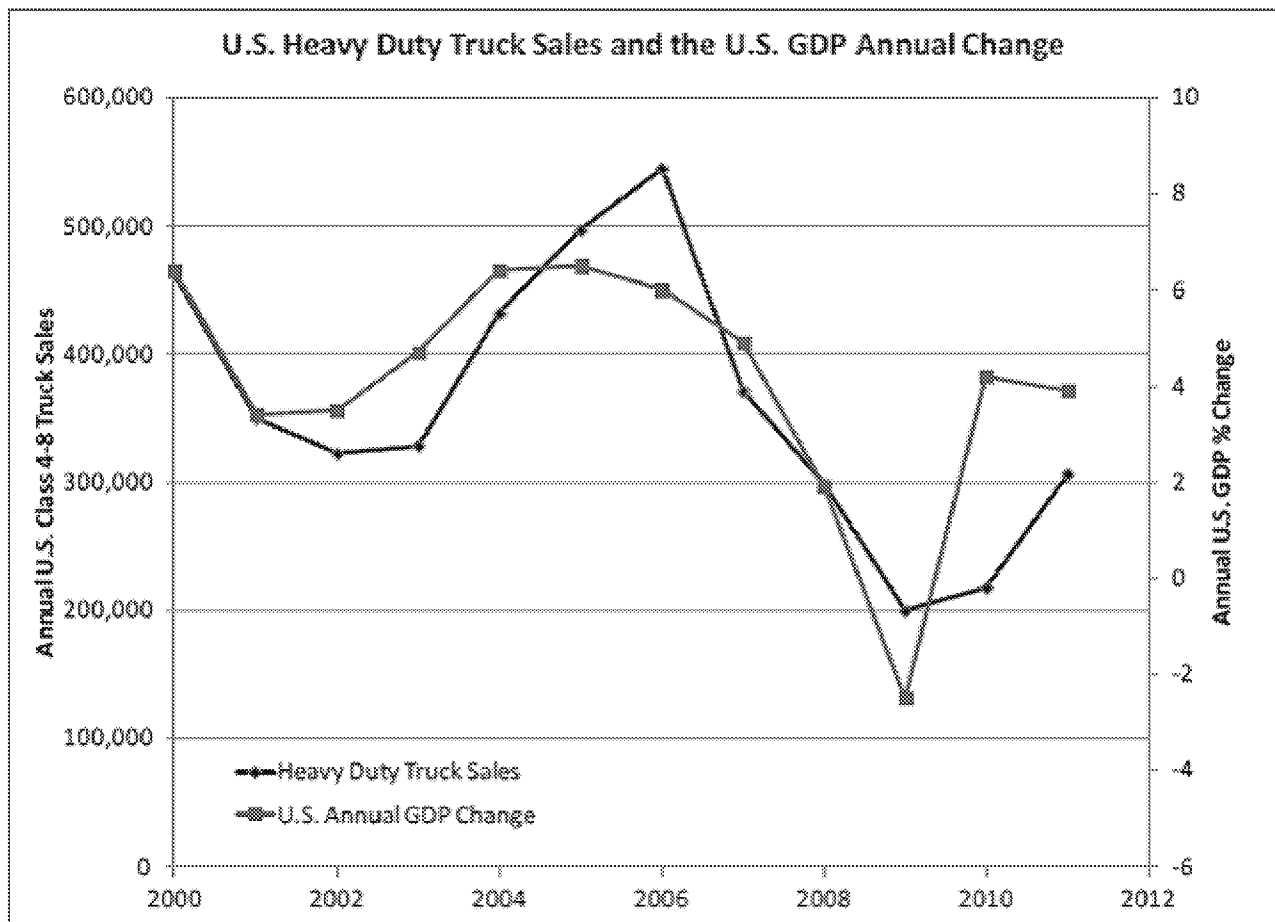


Figure 1: U.S. Class 4-8 Truck Sales and U.S. GDP Annual Growth Rate<sup>75</sup>

Bill Charmley

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**From:** Greenhaus, Doug [mailto:DGREENHAUS@NADA.org]  
**Sent:** Wednesday, September 18, 2013 12:01 PM  
**To:** Charmley, William  
**Subject:** Slide deck

We plan to use the attached deck this afternoon. Any word re: NHTSA? See you folks later.

Doug

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